

4 November 2025
Australian Securities Exchange
By email: ListingsComplianceSydney@asx.com.au.

To whom it may concern,

Response to Change of Director's Interest Notice Query

We refer to the attached letter from ASX dated 30 October 2025 regarding the Appendix Y –Change of Director's Interest Notice lodged by Savannah Goldfields Limited (SVG) on 21 October 2025.

In response to the questions set out in ASX's letter, SVG advises the following:

1. Please explain why the Appendix 3Y was lodged late

The late lodgment of the Appendix 3Y is the result of an oversight on the part of the Director - who made a late decision to participate in an entitlement offer being undertaken by SVG. The Director held shares in SVG in 3 different entities and ultimately all three entities participated in the entitlement offer. While the participation of one of the entities was advised to the Company Secretary, and a relevant 3Y lodged in respect of that participation pursuant to the accelerated portion of the rights issue the participation of the other two entities occurred after the submission of the initial Appendix 3Y was inadvertently not advised to the Company Secretary and the Director acknowledges his error in not lodging a further updated Appendix 3Y. None of the shares acquired by any of participating entities has been disposed of or otherwise transferred. Upon SVG becoming aware of the oversight, SVG included the details and lodged the Appendix 3Y with ASX.

2. What arrangements does SVG have in place under Listing Rule 3.19B with its directors to ensure that it is able to meet its disclosure obligations under Listing Rule 3.19A?

The Directors are obliged under their respective Director appointment agreements and under the Company Securities Trading Policy to notify changes in their notifiable interests so as to enable SVG to comply with its obligations under ASX Listing Rule 3.19A.

3. If the current arrangements are inadequate or not being enforced, what additional steps does SVG intend to take to ensure compliance with Listing Rule 3.19B?

SVG believes its processes are adequate to ensure that future disclosures will be released to the ASX in accordance with the requirements of the ASX Listing Rules.

Yours sincerely



Paul Marshall

Company Secretary

pmarshall@savannahgoldfields.com

30 October 2025

Reference: 114330

Mr Paul Marshall
Company Secretary
Savannah Goldfields Limited
Level 21 Matisse Tower
110 Mary St
Brisbane QLD 4000

By email

Dear Mr Marshall

Savannah Goldfields Limited ('SVG'): Appendix 3Y – Change of Director's Interest Notice Query

ASX refers to the following:

1. SVG's Appendix 3Y lodged on the ASX Market Announcements Platform ('MAP') on 21 October 2025 for Mr Richard Stacy Anthon (the 'Notice');
2. Listing Rule 3.19A which requires an entity to tell ASX the following:

3.19A.1 *'The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the following times.*

- *On the date that the entity is admitted to the official list.*
- *On the date that a director is appointed.*

The entity must complete Appendix 3X and give it to ASX no more than 5 business days after the entity's admission or a director's appointment.

3.19A.2 *A change to a notifiable interest of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) including whether the change occurred during a closed period where prior written clearance was required and, if so, whether prior written clearance was provided. The entity must complete Appendix 3Y and give it to ASX no more than 5 business days after the change occurs.*

3.19A.3 *The notifiable interests of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) at the date that the director ceases to be a director. The entity must complete Appendix 3Z and give it to ASX no more than 5 business days after the director ceases to be a director.'*

3. Listing rule 3.19B which states that:

'An entity must make such arrangements as are necessary with a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) to ensure that the director discloses to the entity all the information required by the entity to give ASX completed Appendices 3X, 3Y and 3Z within the time period allowed by listing rule 3.19.A. The entity must enforce the arrangements with the director.'

The Notice indicates that a change in Mr Anthon's notifiable interest occurred on 26 February 2025. It appears that the Notice should have been lodged with ASX by 5 March 2025. Consequently, SVG may have breached

Listing Rules 3.19A and/or 3.19B. It also appears that Mr Anthon may have breached section 205G of the *Corporations Act 2001* (Cth).

Request for Information

Under Listing Rule 18.7, we ask that you answer each of the following questions having regard to Listing Rules 3.19A and 3.19B and *Guidance Note 22: Director Disclosure of Interests and Transactions in Securities - Obligations of Listed Entities*.

1. Please explain why the Appendix 3Y was lodged late.
2. What arrangements does SVG have in place under Listing Rule 3.19B with its directors to ensure that it is able to meet its disclosure obligations under Listing Rule 3.19A?
3. If the current arrangements are inadequate or not being enforced, what additional steps does SVG intend to take to ensure compliance with Listing Rule 3.19B?

When and where to send your response

This request is made under Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by no later than **10:00 AM AEDT Tuesday, 4 November 2025**. You should note that if the information requested by this letter is information required to be given to ASX under Listing Rule 3.1 and it does not fall within the exceptions mentioned in Listing Rule 3.1A, SVG's obligation is to disclose the information 'immediately'. This may require the information to be disclosed before the deadline set out in the previous paragraph and may require SVG to request a trading halt immediately.

Your response should be sent to me by e-mail at ListingsComplianceSydney@asx.com.au. It should not be sent directly to the ASX Market Announcements Office. This is to allow me to review your response to confirm that it is in a form appropriate for release to the market, before it is published on the ASX Market Announcements Platform.

Trading halt

If you are unable to respond to this letter by the time specified above, you should discuss with us whether it is appropriate to request a trading halt in SVG's securities under Listing Rule 17.1. If you wish a trading halt, you must tell us:

- the reasons for the trading halt;
- how long you want the trading halt to last;
- the event you expect to happen that will end the trading halt;
- that you are not aware of any reason why the trading halt should not be granted; and
- any other information necessary to inform the market about the trading halt, or that we ask for.

We require the request for a trading halt to be in writing. The trading halt cannot extend past the commencement of normal trading on the second day after the day on which it is granted. You can find further information about trading halts in Guidance Note 16 *Trading Halts & Voluntary Suspensions*.

Suspension

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in SVG's securities under Listing Rule 17.3.

Listing Rules 3.1 and 3.1A

In responding to this letter, you should have regard to SVG's obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure*: Listing Rules 3.1 – 3.1B. It should be noted that SVG's obligation to disclose information under Listing Rule 3.1 is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

Release of correspondence between ASX and entity

ASX reserves the right to release all or any part of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

Yours sincerely

ASX Compliance